

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WALRUS MASTER FUND LTD.,

Plaintiff,

- vs -

CITIGROUP GLOBAL MARKETS, INC.

Defendant.

Civil Action No. 08-cv-02404

ECF CASE

**STIPULATION REGARDING EXTENSION OF TIME TO RESPOND OR  
OTHERWISE MOVE TO DISMISS THE COMPLAINT; PROPOSED ORDER**

WHEREAS, on March 10, 2008, plaintiff filed its complaint;

WHEREAS, this request is Citigroup Global Markets Inc.'s (CGMI) first request  
for an extension of time;

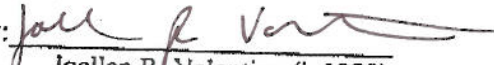
WHEREAS, the parties agree that it is appropriate to extend CGMI's time to  
answer or move to dismiss the complaint;

THEREFORE, SUBJECT TO THE APPROVAL OF THE COURT, IT IS  
HEREBY STIPULATED THAT:

CGMI will answer or move to dismiss the Complaint on or before April 25, 2008.

Dated: March 24, 2008


CITIGROUP GLOBAL MARKETS INC.

By:   
Joellen R. Valentine (jv1229)

Citigroup Global Markets Inc.  
388 Greenwich St., 17<sup>th</sup> Floor  
New York, New York 10013  
(212) 816-4002  
Attorney for Defendant Citigroup  
Global Markets, Inc.

Dated: March 24, 2008

WALRUS MASTER FUND LTD.

By:   
Francis Bigelow, Esq. (FB-8749)

SADIS & GOLDBERG LLP  
Attorneys for Plaintiff  
551 Fifth Avenue, 21<sup>st</sup> Floor  
New York, New York 10176  
(212) 947-3793

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STIPULATION & PROPOSED ORDER RE EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT - 08 CV 02404

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

- VS -

CITIGROUP GLOBAL MARKETS, INC.

Defendant.

Civil Action No. 08-cv-02404

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## PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:

Defendant Citigroup Global Markets Inc. will answer or move to dismiss on or before by April 25, 2008.

Dated: \_\_\_\_\_

The Honorable Deborah A. Batts  
United States District Judge